

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

FILED

UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

JUANA MARGARITA CARLSON,

00 JUL 14 PM 3:43

Plaintiff,

v.

No. CV 00 0215 LH/DJS

SANTA MARIA EL MIRADOR, a
New Mexico Corporation, and
S. LEE ROSEN, individually
and in their supervisory capacity, and
MORRIS PAIZ, individually,

Defendants.

ATTORNEYS' PROVISIONAL DISCOVERY PLAN

1. Pursuant to Fed. R. Civ. P. 26(f) a meeting was held telephonically
on July 12, 2000 and attended by:

George T. Geran for Plaintiff

Paula G. Maynes for Defendant Santa Maria El Mirador and S. Lee Rosen.

Pro bono Counsel for Defendant Morris Paiz, Grace R. Philips of

Montgomery & Andrews, recently entered her appearance, and has requested
and was granted by plaintiff an extension to answer until Ms. Philips can attempt
to establish to plaintiff's satisfaction that Mr. Paiz is both a pauper and
incompetent, which would result in plaintiff's voluntary dismissal of the claim
against Mr. Paiz. Ms. Philips did not attend the "meet and confer" but has
participated to a limited extent in the drafting of the provisional discovery plan,
and thus, has signed below.

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2. Discovery Plan. The parties jointly propose to the Court the following discovery plan:

Discovery will be needed on the following subjects:

- a) The factual bases for Plaintiff's claims
- b) The factual bases for the Defendants' defenses.

All discovery commenced in time to be completed by November 30, 2000.

An independent psychological evaluation of the Plaintiff.

Maximum of 50 interrogatories for each party to any other party (responses due 30 days after service).

Maximum of 25 requests for admissions for each party to any other party (responses due 30 days after service).

Maximum of 10 depositions by Plaintiff and 10 by Defendants.

Each deposition (other than of Juana Maria Carlson and Lee Rosen) limited to maximum of 4 hours unless extended by agreements of parties.

Reports from retained experts under Rule 26(a)(2) due:

from Plaintiff by September 15, 2000.

from Defendants by October 16, 2000.

Supplementation under Rule 26(e) due November 30, 2000.

3. Other Items.

The parties request a settlement conference before a magistrate judge after the parties have exchanged their initial disclosures.

The parties request a pre-trial conference 60 days before trial.

Plaintiff should be allowed until September 15, 2000 to join additional parties and to amend pleadings.

Defendants should be allowed until September 15, 2000 to join additional parties and to amend the pleadings.

All potentially dispositive motions should be filed by January 8, 2001. Motion packages for dispositive motions shall be filed with the Court by February 28, 2001.

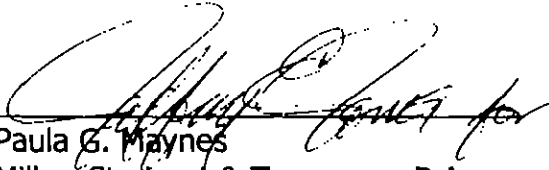
Plaintiff should provide her portion of the Pre-Trial Order to Defendants 90 days before trial, and Defendants shall submit to the Court 75 days before trial.

Settlement is mutually thought fair to poor at this point.

Respectfully Submitted,

Telephonic approval: July 14, 2000
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for Plaintiff


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for Defendants Santa Maria El Mirador

Telephonic approval: July 14, 2000

Grace Philips

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